



Department of Health

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Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

January 11, 2019

Melissa Sweet
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233

Re: **Draft PFAS Expanded Site Investigation
Work Plan**
Seneca Army Depot
Site #850006
Romulus, Seneca County

Dear Ms. Sweet:

I have completed my review of the October 2018 *Draft Per- and Polyfluoroalkyl Substances (PFAS) Expanded Site Investigation Work Plan* for the referenced site and have the following comments:

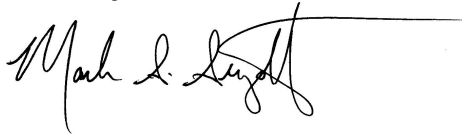
1) Section 3.1.1, Monitoring Well Locations – The proposed primary monitoring well locations (per Figures 1 & 2) for the Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD-26) do not adequately characterize the geographical areas that are located hydraulically downgradient (west) of the referenced sites. Based on the proposed redevelopment plans (farming, homesteads) in areas located west of the 2 sites, additional downgradient monitoring wells in these areas should be included as part of defining the nature and extent of any site-related PFAS contamination.

2) When characterizing deeper subsurface geological units as part of the expanded site investigation, please implement safe drilling procedures (e.g., monitoring wells using double casing & proper grouting) when penetrating bedrock and/or other subsurface confining units to prevent any site-related PFAS contamination from migrating to underlying groundwater aquifers that are used by the surrounding area.

In addition to these comments, I also agree with the E-mail comments (dated December 14, 2018) submitted by Mr. Bob Morse of the United States Environmental Protection Agency (to Randy Battaglia – Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E) on the referenced work plan.

Based on all agency comments, I recommend a site meeting be held with the Army to discuss this next phase of PFAS investigation. If you have any questions, please contact me at (518) 402-7860.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark S. Sergott", with a long horizontal line extending to the right.

Mark S. Sergott, P.G.
Public Health Specialist
Bureau of Environmental Exposure Investigation

ec: J. Deming / e-File
A. Bonamici – NYSDOH WRO
V. Swinehart – SCHD
E. Obrecht / J. Swartwout – NYSDEC Central Office
B. Schilling – NYSDEC Region 8
B. Morse – USEPA Region 2